

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

DR. MARKCUS KITCHENS, JR.)	
PLAINTIFF)	
)	CIVIL ACTION NO.:
v.)	2:22-CV-03301-JMY
)	
UNITED STATES MEDICAL LICENSING EXAMINATION,)	
ET. AL)	
DEFENDANTS)	
)	

PLAINTIFF’S NOTICE AND SERVICE OF FRCP 26(4) EXPERT WITNESS DISCLOSURE

Comes the Plaintiff, Dr. Marcus Kitchens, Jr. (hereby “Dr. Kitchens”), pro se, and in compliance with FRCP 26(a)(2), the Court Order dated March 13, 2023 (D.E. 34), and the parties stipulation in their Amended Joint Rule 26(F) Report (D.E. 33)¹ hereby discloses the expert opinions of Christopher Pullins, M.D., as set forth below.

Dr. Pullins may testify on one or more of the following topics: issues regarding treatment of mental health diagnoses and the relationship between mental health, medicine generally, and the African American diaspora. More specifically, he will testify regarding the primary care practitioner’s role in diagnosing and treating neurological behaviors and prescribing controlled substances. Dr. Pullins’s opinions will be stated within degree of reasonable probability, are based on his review of the medical records filed, written discovery responses of NBME, written discovery responses of Plaintiff, Dr. Kitchens, the deposition testimony of Dr. Kitchens, the affidavit of Missie King, his personal experience and expertise as a Family Medicine practitioner.

Dr. Pullins is the Department Chair of Family Medicine at Mayo Clinic and may also serve as fact witness in this matter on the subjects listed above and/or other topics.

¹ The Amended Joint Rule 26(f) Report states: “The parties propose forgoing formal expert reports given the expedited proceedings. The parties will identify the name(s) of any affirmative testifying experts and provide a brief (one paragraph) description of the anticipated subjects of their testimony by or before April 7, 2023.”

Respectfully submitted,

/s/ Dr. Marcus Kitchens

Dr. Marcus Kitchens
625 Hampton Way, #2
Richmond, KY 40475
T: (423) 314-4096
markzwanz@gmail.com
Pro Se Plaintiff

CERTIFICATE OF SERVICE

It is hereby certified that a true and accurate copy of the foregoing was filed electronically via the Pacer system and served to the following on April 7, 2023.

Jared D. Bayer
Cozen O'Connor
One Liberty Place
1650 Market Street, Ste. 2800
Philadelphia, PA 19103
T: (215) 665-4127
Counsel for Defendant
National Board of Medical Examiners

Caroline M. Mew
Perkins Coie LLP
700 Thirteenth Street, N.W., Ste. 800
Washington, D.C. 20005-3960
T: (202) 654-6200
E: CMew@perkinscoie.com
Counsel for Defendant